

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

DAVID HENEGAR,	)	
	)	
<i>Plaintiff,</i>	)	
	)	Case No. 4:18-cv-00192-HLM
v.	)	
	)	
CINDY McDADE, et al.,	)	JURY TRIAL DEMANDED
	)	
<i>Defendants.</i>	)	

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES**

# EXHIBIT 6

**Rachel Brady** <brady@loevy.com>  
To: Laura Lones <llones@law.ga.gov>  
Cc: Paul Henefeld <pah@aps-law.com>, Zack Greenamyre <zack@mitchellshapiro.com>

Wed, Jul 10, 2019 at 12:30 PM

Counsel,

First, I did not receive the additional documents you said were sent on July 8. Defendants said they would produce these responsive documents three weeks ago. Please produce them immediately.

Second, please confirm with your IT person that you will search for and produce documents relating to complaints filed against defendants by Friday. This delay is holding up further discovery and causing Plaintiff significant prejudice. I will file a motion to compel on Monday if I do not receive the documents by then.

Finally, given Defendants' significant delays in producing responsive documents, we will need to request an extension to the discovery deadline. It currently closes on July 22. I think three months will be appropriate. Can I file the motion unopposed?

Thanks,  
Rachel

On Mon, Jul 8, 2019 at 4:55 PM Laura Lones <llones@law.ga.gov> wrote:

[Quoted text hidden]

[Quoted text hidden]

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**Laura Lones** <llones@law.ga.gov>  
To: Rachel Brady <brady@loevy.com>  
Cc: Paul Henefeld <pah@aps-law.com>, Zack Greenamyre <zack@mitchellshapiro.com>

Wed, Jul 10, 2019 at 5:22 PM

Rachel,

It does appear that no documents were sent on July 8 as I thought they would be. I will get on that and make sure those are sent.

And I am agreeable to a 3 month extension of discovery.



**Laura Lones**  
**Senior Assistant Attorney General**  
**Office of Attorney General Chris Carr**  
**General Litigation**

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**Rachel Brady** <brady@loevy.com>

Fri, Jul 12, 2019 at 4:56 PM

To: Laura Lones <llones@law.ga.gov>

Cc: Paul Henefeld <pah@aps-law.com>, Zack Greenamyre <zack@mitchellshapiro.com>

Laura,

I have not received these documents. Please send them immediately, along with your updated discovery responses as agreed.

Rachel

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